

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X		:
ALEXANDRIA FITZGERALD,		:
	Plaintiff,	:
		:
-against-		:
		: Civil Action No.: 1:20-cv-05260-AT
		:
THE WE COMPANY d/b/a WEWORK, DAVID		:
STILES and DANNY DUONG, in their		:
Individual and professional capacities,		:
		:
	Defendants.	:
-----X		:

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that Defendants We Work Management LLC (“WeWork”), Danny Duong and David Stiles (“Defendants”), relying upon the accompanying Memorandum of Law, Declaration of David W. Garland, Esq. and the exhibits annexed thereto, Declaration of Alissa Horn and the exhibits annexed thereto, Declaration of Maria Cox and the exhibits annexed thereto, Declaration of David M. Stiles, and the exhibits annexed thereto, Declaration of Akash Agarwal and the exhibits annexed thereto, and Declaration of Ivan Kondili, and the exhibit annexed thereto, Local Civil Rule 56.1 Statement, and all of the pleadings and proceedings had herein, will move this Court, before the Honorable Judge Analisa Torres, United States District Judge for the Southern District of New York, at 500 Pearl St, New York, New York 10007 for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting Summary Judgment to Defendants and dismissing the First Amended Complaint.

PLEASE TAKE FURTHER NOTICE that pursuant to the Order of Judge Torres issued on May 25, 2021 (ECF#38), opposing papers, if any, are due on July 20, 2021, and by Order issued on June 22, 2021 (ECF #40), the reply papers are due on August 17, 2021.

WHEREFORE, Defendants respectfully request that the Court grant their Motion for Summary Judgment and dismiss the First Amended Complaint with prejudice, and grant any other relief the Court deems to be just and proper

DATED: June 29, 2021

EPSTEIN BECKER & GREEN, P.C.

By: /s/ David W. Garland
DAVID W. GARLAND

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